

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE WASHINGTON MUTUAL, INC.
SECURITIES & ERISA LITIGATION

No. 2:08-md-1919 MJP

IN RE WASHINGTON MUTUAL, INC.
SECURITIES LITIGATION

Lead Case No. C08-387 MJP

This Document Relates to: ALL CASES

PLC-20

**MOTION FOR LEAVE TO FILE
EXCESS PAGES IN FINAL
APPROVAL AND ATTORNEYS'
FEE MOTIONS**

NOTE ON MOTION CALENDAR
September 16, 2011

Pursuant to the Court's Order Preliminarily Approving Proposed Settlements and Providing for Notice dated July 21, 2011 (Dkt. No. 875), Lead Plaintiff Ontario Teachers' Pension Plan Board intends to file a Motion for Final Approval of Class Action Settlements and a Motion for Approval of the Plan of Allocation, and Lead Counsel intends to file a Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses by September 25, 2011. Each of these proposed motions is governed by Local Rule CR 7(e)(4) and would ordinarily be subject to a limit of 12 pages.

MOTION FOR LEAVE TO FILE EXCESS PAGES
[PLC-20]
Master No: 2:08-md-1919 MJP

Bernstein Litowitz Berger & Grossmann LLP
1285 Avenue of the Americas
New York, NY 10019
(212) 554-1400

Pursuant to Local Rule CR 7(f)(1), Lead Plaintiff hereby respectfully requests leave to file Lead Plaintiff's Motion for Final Approval of Class Action Settlements and Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses as overlength motions of up to 25 pages. (No additional pages are sought for the Motion for Approval of the Plan of Allocation.) Lead Plaintiff seeks to file excess pages in order to provide the Court with more detailed explanations of the considerations that support final approval of the three proposed Settlements and the request for attorneys' fees and litigation expenses, in light of the magnitude and complexity of the Action and the multi-factor analyses established by the Ninth Circuit for review of class action settlements.

Dated: September 16, 2011

Respectfully submitted,

BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP

By: /s/ Hannah Ross
Hannah Ross (*pro hac vice*)
Katherine M. Sinderson (*pro hac vice*)
1285 Avenue of the Americas
New York, New York 10019
Tel: (212) 554-1400
Fax: (212) 554-1444
Email: hannah@blbglaw.com
katherine@blbglaw.com

***Counsel for Lead Plaintiff
Ontario Teachers' Pension Plan Board and
Lead Counsel for the Class***

BYRNES & KELLER LLP
Bradley S. Keller, WSBA# 10665
Jofrey M. McWilliam, WSBA# 28441
1000 Second Avenue, Suite 3800
Seattle, Washington 98104
Tel: (206) 622-2000
Fax: (206) 622-2522
Email: bkeller@byrneskeller.com
jmcwilliam@byrneskeller.com

Liaison Counsel for the Class

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses on the Court's Electronic Mail Notice list.

BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP

By: /s/ Hannah Ross
Hannah Ross (*pro hac vice*)
Katherine M. Sinderson (*pro hac vice*)
1285 Avenue of the Americas
New York, New York 10019
Tel: (212) 554-1400
Fax: (212) 554-1444
Email: hannah@blbglaw.com
katherine@blbglaw.com

***Counsel for Lead Plaintiff
Ontario Teachers' Pension Plan Board
and Lead Counsel for the Class***

BYRNES & KELLER LLP
Bradley S. Keller, WSBA# 10665
Jofrey M. McWilliam, WSBA# 28441
1000 Second Avenue, Suite 3800
Seattle, Washington 98104
Tel: (206) 622-2000
Fax: (206) 622-2522
Email: bkeller@byrneskeller.com
jmcwilliam@byrneskeller.com

Liaison Counsel for the Class

#577247

Bernstein Litowitz Berger & Grossmann LLP
1285 Avenue of the Americas
New York, NY 10019
(212) 554-1400